



## PACIFIC FOREST TRUST

Private Forests. Public Treasures.

September 9, 2021

California Air Resources Board  
1001 I Street  
Sacramento, CA 95814

**RE: Draft Cap-and-Trade Auction Proceeds Fourth Investment Plan**

Thank you for the opportunity to provide comment on the Draft Cap-and-Trade Auction Proceeds Fourth Investment Plan ("the plan"). We are glad the plan recognizes the essential role of forests and other natural and working lands in achieving California's greenhouse gas reduction targets. As Californians are reminded each day of the disastrous consequences of climate change, it is only becoming clearer that we must accelerate investments in management that not only reduces greenhouse gases in the atmosphere, but also builds and maintains resilient landscapes into the future.

Highlighting the use of conservation easements as a tool to protect and enhance resilient carbon stocks is a helpful step in ensuring that gains are quantifiable, verifiable, enforceable, and permanent. Future drafts could underline the ability of working forest conservation easements (WFCEs) to go beyond merely protecting land from conversion. Specifically, WFCEs can also include provisions that work to create the type of complex, carbon rich, and climate resilient forest structures that we must attain by midcentury, while also maintaining production. It is essential to have a legal instrument that guarantees such management, as otherwise gains will be prone to reversal at a critical time for the climate.

While the plan underscores the general importance of improved forest management, highlighting specific practices – such as prescribed fire, science-based fuel reduction while protecting large carbon dense trees, and reforestation where appropriate – would help sharpen the focus as to how investments will help our forests adapt and respond to a changing climate.

Further, we appreciate the plan's recognition of the co-benefits that climate smart forest management provides for public health, drinking water supplies, biodiversity, and sustainable rural employment. The focus on interagency cooperation and coordination with regional planning efforts will serve to maximize these benefits and achieve linked state goals.

On a broader level, we are glad to see that integration of nature-based solutions into investment types across sectors is a key funding priority, including greening of

traditionally grey infrastructure. Future drafts of the plan could include enhancement of above-the-dam watershed storage as an example that further demonstrates the potential for cross-sectoral benefits.

Lastly, use of wood as substitute for emissions-intensive fuels and building materials should only be implemented where strict carbon accounting protocols indicate that it is beneficial to do so. Future drafts could more clearly emphasize that whether there is a climate benefit or cost to such substitution depends heavily on forest management. Land managed under a working forest conservation easement, for example, is an excellent source of climate-smart wood.

Thank you once again for recognizing the crucial role of forests in meeting California's climate targets.

Sincerely,

Angus McLean  
Policy Associate